

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

EDWARD J. KOELLER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

CYFLARE SECURITY INC.

Defendant.

No. 4:25-cv-00410-MTS

PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to Local Rule 4.01(A), Plaintiff Edward J. Koeller respectfully moves this Court for a twenty-one (21) day extension of time to respond to Defendant’s Motion to Dismiss (ECF Nos. 20–22). In support, Plaintiff states as follows:

1. Plaintiff filed a First Amended Complaint on June 3, 2025. ECF No. 18.
2. Defendant filed a Motion to Dismiss the First Amended Complaint on June 17, 2025. ECF Nos. 20–22.
3. Pursuant to Local Rule 4.01(B), Plaintiff’s response is currently due on July 1, 2025.
4. Due to the number and complexity of the issues raised in the motion, overlapping deadlines, and counsel’s travel schedules over the Fourth of July holiday, Plaintiff requests a brief extension to allow sufficient time to fully analyze and respond.
5. If granted, Plaintiff’s deadline to respond would be extended to July 22, 2025.
6. On June 30, 2025, Plaintiff’s counsel conferred with Defendant’s counsel, who confirmed that Defendant does not oppose this request.

7. This request is made in good faith and not for purposes of delay. No party will be prejudiced by the extension.

WHEREFORE, that the Court extend the deadline for Plaintiff's response to Defendant's Motion to Dismiss by twenty-one (21) days, up to and including July 22, 2025.

Date: June 30, 2025

/s/ Cassandra P. Miller

Anthony I. Paronich (678437MA)

PARONICH LAW, P.C.

350 Lincoln Street, Suite 2400

Hingham, MA 02043

T: (617) 485-0018

F: (508) 318-8100

anthony@paronichlaw.com

Cassandra P. Miller*

STRAUSS BORRELLI PLLC

980 N. Michigan Avenue, Suite 1610

Chicago, IL 60611

T: (872) 263-1100

F: (872) 263-1109

cmiller@straussborrelli.com

**Pro hac vice*

*Attorneys for Plaintiff and the
Proposed Class*